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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
DEFENDANTS UBER TECHNOLOGIES,  
INC. AND OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL EXHIBITS ATTACHED  
TO THEIR NOTICE OF FILING OF  
PHOTOGRAPHS**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants Uber Technologies, Inc. and  
7 Ottomotto LLC’s Administrative Motion to File Under Seal Exhibits Attached to Their Notice of  
8 Filing of Photographs (the “Administrative Motion”). The Administrative Motion seeks an order  
9 sealing the entirety of Exhibits A-B to Defendants’ Notice of Filing of Photographs.

10 3. The entirety of Exhibits A-B, contain or refer to trade secret information, which  
11 Waymo seeks to seal.

12 4. Exhibits A-B (entire documents) contain Waymo’s asserted trade secrets, including as  
13 misappropriated by Defendants. The information Waymo seeks to seal reflects the confidential design  
14 and functionality of Waymo’s proprietary autonomous vehicle system, including its LiDAR designs,  
15 which Waymo maintains as secret. I understand that these trade secrets are maintained as secret by  
16 Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo’s business (Dkt. 25-31). The  
17 public disclosure of this information would give Waymo’s competitors access to descriptions of the  
18 functionality or features of Waymo’s autonomous vehicle system. If such information were made  
19 public, I understand that Waymo’s competitive standing would be significantly harmed.

20 5. Waymo’s request to seal is narrowly tailored to those portions of Exhibits A-B that  
21 merit sealing.

22  
23 I declare under penalty of perjury under the laws of the State of California and the United  
24 States of America that the foregoing is true and correct, and that this declaration was executed in San  
25 Francisco, California, on October 30, 2017.

26 By /s/ Felipe Corredor

27 Felipe Corredor  
28 Attorneys for WAYMO LLC

**ATTESTATION**

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from Felipe Corredor.

By: /s/ Charles K. Verhoeven  
Charles K. Verhoeven